

BERANBAUM MENKEN BEN-ASHER & BIERMAN LLP

80 PINE STREET, 32ND FLOOR	
NEW YORK, NEW YORK 10005	
Extensions	TELEPHONE: (212) 509-1616
Granted. Conference	FACSIMILE: (212) 509-8088
w. the principals is	WWW.BMELAW.COM
adjourned to 3/28/08 @	
9:00 A.M.	
Work on settlement.	
SO ORDERED:	
Date: 2/1/08	Richard M. Berman
	Richard M. Berman, U.S.D.J.

FEB 01 2008

January 31, 2008

**BY HAND DELIVERY**

Hon. Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 650  
New York, NY 10007

**MEMO ENDORSED**

RE: Brown v. City of New York, et al., No. 07 Civ. 6163

Dear Judge Berman:

This firm represents the plaintiff in the above matter. According to the case management plan set in October, discovery in this matter is scheduled to conclude by February 11, 2008, and a status conference is set for February 13, 2008. At this time, the parties are still discussing settlement and continuing in document discovery. However, discovery has been delayed as a result of difficulties in reaching and meeting with Mr. Brown and in obtaining documentary evidence. Accordingly, both parties request a 45-day extension of the discovery schedule to March 26, 2008. Additionally, we seek an adjournment of the status conference to March 28, 2008. This is our first request for an extension.

Thank you for your consideration.

Respectfully submitted,

  
Kristen E. Finlon

CC: Stuart E. Jacobs, Esq. (by email)

